

Exhibit A

Ellis, Justin

From: Ducharme, Matthew <matthew.ducharme@hoganlovells.com>
Sent: Thursday, March 3, 2022 10:59 AM
To: Tracey, Dennis H.; Ellis, Justin
Cc: Molo, Steven; Clarke, Elizabeth
Subject: RE: Red Tree v. PDVSA, No. 22 Misc. 68 & 69 (D. Del.)

Justin:

Upon review of yesterday's decision, we have determined that Judge Stark did not decide all of the issues raised in our motion and opposition brief and thus our view is that briefing should continue in the ordinary course so that Judge Stark can render a decision in these matters.

Thanks,
Matt

From: Tracey, Dennis H. <dennis.tracey@hoganlovells.com>
Sent: Wednesday, March 2, 2022 3:42 PM
To: Ellis, Justin <JEllis@mololamken.com>; Ducharme, Matthew <matthew.ducharme@hoganlovells.com>
Cc: Molo, Steven <smolo@mololamken.com>; Clarke, Elizabeth <eclarke@mololamken.com>
Subject: RE: Red Tree v. PDVSA, No. 22 Misc. 68 & 69 (D. Del.)

Justin: We will review the decision and get back to you. Dennis

From: Ellis, Justin <JEllis@mololamken.com>
Sent: Wednesday, March 2, 2022 2:52 PM
To: Tracey, Dennis H. <dennis.tracey@hoganlovells.com>; Ducharme, Matthew <matthew.ducharme@hoganlovells.com>
Cc: Molo, Steven <smolo@mololamken.com>; Clarke, Elizabeth <eclarke@mololamken.com>
Subject: Red Tree v. PDVSA, No. 22 Misc. 68 & 69 (D. Del.)

Dennis, Matt:

Judge Stark's decision today in the ConocoPhillips case, attached, rejects all material arguments PDVSA made in opposition to Red Tree's motion for a writ of attachment. That decision has issue-preclusive effect in these cases. Further, because Judge Stark has stated that he will likely allow an interlocutory appeal from the ConocoPhillips decision, any ruling the Third Circuit issues in that appeal will control the outcome of Red Tree's motion in any event. At this point, further litigating this motion would only increase PDVSA's costs for attorney's fees, including both the fees it pays its own counsel and the fees it would have to pay Red Tree under the parties' contracts.

We thus propose that PDVSA and Red Tree stipulate that the ConocoPhillips decision resolves Red Tree's motions, subject to both parties' right to participate in any interlocutory appeal. If you agree, we will prepare a stipulation for your review.

Justin

Justin M. Ellis

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